

07-1850-CD
Target Natl Bank vs T. McGlynn

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK/TARGET VISA

Plaintiff

v.

TAMMY J MCGLYNN

Defendant(s)

NO. 07-1850-CD

**COMPLAINT IN CIVIL
ACTION**

Filed on behalf of:
TARGET NATIONAL
BANK/TARGET VISA

Counsel of Record for This Party:

Gregg L. Morris, Esquire
Pa I.D. #69006

Patenaude & Felix, A.P.C.
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675

FILED Any pd. 85.00
NOV 13 2007
WAS
ICC Sheriff

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK/TARGET VISA

Plaintiff

v.

TAMMY J MCGLYNN

Defendant(s)

NO.

NOTICE TO DEFEND

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within TWENTY (20) DAYS after this Complaint and notice are served, by entering a written appearance personally or by an attorney, and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

Usted ha sido demandado en corte. Si usted desea defenderse de las demandas que se presentan mas adelante en las siguientes paginas, debe tomar accion dentro de los proximos veinte (20) dias despues de la notificacion de esta Demanda y Aviso radicando personalmente o por medio de un abogado una comparecencia escrita y radicando en la Corte por escrito sus defensas de, y objeciones a, las demandas presentadas aqui en contra suya. Se le advierte de que si usted fall de tomar accion como se describe anteriormente, el caso pude proceder sin usted y un fallo por cualquier suma de dinero reclamada en la demanda o cualquier reclamacion o remedio solicitado por el demandante puede ser dictado en contra suya por la Corte sin mas aviso adicional. Usted puede perder dinero o propiedad au otros derechos importantes para usted.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER

USTED DEBE LLEVAR ESTE DOCUMENTO A SU ABOGADO INMEDIATAMENTE. SI USTED NO TIENE UN ABOGADO, LLAME O VAYA A LA SIGUENTE OFICINA. ESTA OFICINA PUEDE PROVEERLE INFORMACION A CERCA DE COMO CONSEGUIR UN ABOGADO

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

SI USTED NO PUEDE PAGAR POR LOS SERVICIOS DE UN ABOGADO, ES POSSIBLE QUE ESTA OFICINA LE PUEDA PROVEER INFORMACION SOBRE AGENCIAS QUE OFREZCAN SERVICIOS LEGALES SIN CARGO O BAJO COSO A PERSONAS QUE CALIFICAN.

CLEARFIELD COUNTY COURTHOUSE
DAVID S. MEHOLICK, COURT
ADMINISTRATOR
230 EAST MARKET STREET
CLEARFIELD, PA 16830
814-765-2641

CLEARFIELD COUNTY COURTHOUSE
DAVID S. MEHOLICK, COURT
ADMINISTRATOR
230 EAST MARKET STREET
CLEARFIELD, PA 16830
814-765-2641

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK/TARGET VISA)	
)	
Plaintiff)	NO.
)	
v.)	
)	
TAMMY J MCGLYNN)	
)	
Defendant(s))	
)	

COMPLAINT IN CIVIL ACTION

AND NOW, comes Plaintiff, TARGET NATIONAL BANK/TARGET VISA , by and through its attorney, GREGG MORRIS, ESQUIRE and the law offices of PATENAUDE & FELIX, A.P.C. and files the following **Complaint in Civil Action**, and in support thereof aver as follows:

1. Plaintiff, TARGET NATIONAL BANK/TARGET VISA , is a corporation and for the purpose of this litigation, maintaining a place of business c/o PATENAUDE AND FELIX, A.P.C., 213 East Main St Carnegie, Pennsylvania 15106.
2. Defendant is TAMMY J MCGLYNN, an adult individual, believed to currently reside at 77 ALEXANDER LN HOUTZDALE, PA 16651-8327.
3. Heretofore, the Defendant(s) opened a account with Plaintiff being Account No. 4352376714501400, for the purchase of good and services:
4. The Defendant(s) has/have made or authorized a number of purchases and as of September 15, 2007, Defendant(s) owes \$9,385.35 on said account plus interest at 0.00 %.
5. Plaintiff maintains accurate books of account recording all credits and debits for

this account.

6. The Defendant(s) have/has received monthly billing statements from Plaintiff setting forth the nature and amount of all charges made by Defendant(s), and the transactions between Plaintiff and Defendant(s) give rise to an account stated, upon which Plaintiff has relied.

7. The Defendant(s) made payments, but have/has refused to pay, and now refuses to pay the balance due and owing on the aforesaid account in the sum of \$9,385.35, plus interest and costs.

8. By failing to object or dispute the statements, Defendant(s) have/has assented to and agreed to the correctness of the balance due on the credit card account so as to constitute and account stated.

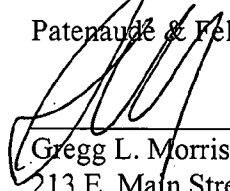
9. Despite repeated demands, Defendant(s) have/has failed to make the required installment payments when due and therefore the full amount of the account is now due and payable.

WHEREFORE, Plaintiff demands Judgment in its favor, and against Defendant(s), in the amount of \$9,385.35, plus legal interest from the date of breach, with continuing interest at the legal rate thereon from the date of Judgment plus costs. The damages requested are less than the maximum amount for compulsory arbitration as set by the Court.

Respectfully submitted:

Patenaude & Felix, A.P.C.

Date: _____



Gregg L. Morris, Esquire
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675



Account Number: 4352-3767-1450-1400
TAMMY J MCGLYNN

Statement Closing Date: **September 15, 2007**
Page 1 of 2

Target Visa Credit Card Account Summary

Total Credit Limit	\$0
Cash Limit	\$0.
Available Credit	\$0
Portion Available for Cash	\$0

The Cash Limit is a portion of the Total Credit Limit

Previous Balance	\$9,350.35
Payments & Credits	0.00
Purchases & Advances	0.00
Other Charges	35.00
FINANCE CHARGES	0.00
New Balance	\$9,385.35
Amount Past Due	\$2,070.11
Minimum Payment Due (includes any Amount Past Due)	\$9,385.35
Payment Due Date	October 10, 2007

Questions? Call Us:

Target Credit Services 1-888-755-5856
TDD/TDY 1-800-347-5842
Outside the U.S. 11-612-307-8622 (Call Collect)
Calling will not preserve your billing-error rights

Payments & Credits

No payments or credits were received last month.

Other Charges

Sep. 9 LATE PAYMENT FEE

	\$35.00
Total Other Charges	\$35.00

Target National Bank, an affiliate of Target Stores

NOTICE: SEE REVERSE SIDE FOR IMPORTANT INFORMATION



INCLUDE THIS PORTION WITH YOUR PAYMENT MADE PAYABLE TO TARGET NATIONAL BANK



Account Number	4352-3767-1450-1400
New Balance	\$9,385.35
Minimum Payment Due	\$9,385.35
Payment Due Date	October 10, 2007

NEW PHONE, HOME OR
E-MAIL ADDRESS?
PLEASE UPDATE ON
REVERSE SIDE.

OFFICE COPY

STATEMENT PAGE NOT PRINTED

TARGET NATIONAL BANK
P.O. BOX 59317
MINNEAPOLIS, MN 55459-0317

Amount
Enclosed

\$

TAMMY J MCGLYNN
77 ALEXANDER LN
HOUTZDALE, PA 16651-8327

Abstract

3000500938535093853590435237671450140071



00000

Account Number: 4352-3767-1450-1400
TAMMY J MCGLYNN

Statement Closing Date: September 15, 2007
Page 2 of 2

Finance Charges

Days in Billing Period: 31

Balance Type	Daily Periodic Rate	Corresponding Annual Percentage Rate	Average Daily Balance	Periodic FINANCE CHARGE	Transaction FINANCE CHARGE
Purchases	0.07736%	28.24%	\$0.00	\$0.00	\$0.00
Cash	0.07736%	28.24%	\$0.00	\$0.00	\$0.00

Total FINANCE CHARGES: \$0.00

Actual ANNUAL PERCENTAGE RATE: 0.00%

There is a minimum FINANCE CHARGE of \$1.00 for any billing period in which a Finance Charge is imposed.

In _____ Court

Judicial (Circuit/District)

Original Creditor Name: TARGET NATIONAL BANK
Debtor Name: MCGLYNN, TAMMY J
Co-Debtor Name:
Account Number: 4352376714501400

AFFIDAVIT OF ACCOUNT

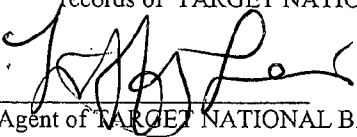
STATE OF MINNESOTA
COUNTY OF HENNEPIN

ss:

The undersigned, TIFFANY LEWIS states that:

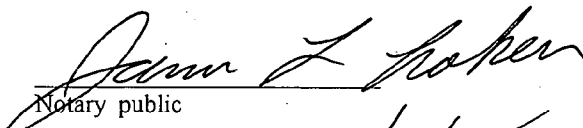
1. I am a representative of TARGET NATIONAL BANK and am authorized to Verify current balances due and owing to TARGET NATIONAL BANK on credit card accounts.
2. As of the date of this affidavit I have reviewed the records of the above listed person and account, and that the amount due and owing to TARGET NATIONAL BANK on this account, over and above all known legal set offs is \$9385.35.
3. That reasonable inquiry has been made to determine if the defendant is in the military service of the United States of America, and to the best of my knowledge that defendant is not in such military service and is therefore not entitled to the rights and privileges provided under the Soldiers and Sailors Civil Relief Act of 1940, as amended.

That the above information is true to the best of my knowledge,
information and belief, and based upon the books and business
records of TARGET NATIONAL BANK.



Authorized Agent of TARGET NATIONAL BANK

Subscribed and sworn to before
Me on 25th day of September, 2007



Notary public

My commission expires: 1/31/08

4352376714501400
A144 PATENAUDE & FELIX, A.P.C



The undersigned does hereby verify subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities, that she is, Tiffany Lewis, Assistant Secretary, of Target National Bank, Plaintiff Herein, that she is duly authorized to make this Declaration, and hat the facts set forth in the foregoing Complaint in Civil Action are true and correct to the best of her knowledge, information and belief.

A handwritten signature in black ink, appearing to read 'Tiffany Lewis', written over a horizontal line.

Tiffany Lewis
Authorized Agent of Target National Bank/Target Visa

4352376714501400

A144

PATENAUDE & FELIX, A.P.C

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103431
NO: 07-1850-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: TARGET NATIONAL BANK/TARGET VISA
vs.
DEFENDANT: TAMMY J. MCGLYNN

SHERIFF RETURN

NOW, November 28, 2007 AT 11:06 AM SERVED THE WITHIN COMPLAINT ON TAMMY J. MCGLYNN
DEFENDANT AT 77 ALEXANDER LN, HOUTZDALE, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO
TIM MCGLYNN, HUSBAND A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN
THE CONTENTS THEREOF.

SERVED BY: DAVIS /

FILED
9/2:49/07
FEB 20 2008

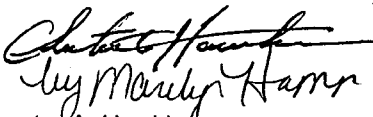
William A. Shaw
Prothonotary/Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	PATENAUDE	17249	10.00
SHERIFF HAWKINS	PATENAUDE	17249	35.46

Sworn to Before Me This

____ Day of _____ ²⁰⁰⁸
~~2007~~

So Answers,


Chester A. Hawkins
Sheriff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK/TARGET VISA

Plaintiff

v.

TAMMY J MCGLYNN

Defendant(s)

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)
)

NO. 07-1850-CD

**PRAECIPE FOR DEFAULT
JUDGMENT**

Filed on behalf of:
TARGET NATIONAL
BANK/TARGET VISA

Counsel of Record for This Party:

Gregg L. Morris, Esquire
Pa I.D. #69006

Patenaude & Felix, A.P.C.
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675

FILED *Atty. pd. 20.00*
M/J: 13.62
MAR 03 2008 *ICC Notice to Def.*

William A. Shaw
Prothonotary/Clerk of Courts

Statement to Atty
(CR)

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK/TARGET VISA

Plaintiff

v.

TAMMY J MCGLYNN

Defendant(s)

NO. 07-1850-CD

PLAINTIFF'S PRAECIPE FOR DEFAULT JUDGMENT

TO: PROTHONOTARY

Please enter a judgment against the defendant, above named, for failure to file an Answer to Plaintiff's complaint.

Amount claimed in Complaint	\$9,385.35
Interest from September 18, 2007	\$0.00
Less payments received	\$0.00
Attorney's fees	\$0.00
TOTAL	\$9,385.35

With continuing interest on the principal amount of \$9,385.35, with interest at the legal rate, plus costs of suit.

I hereby certify that a written notice of intention to file this praecipe was mailed to the defendants and defendants' counsel (if known), after the default had occurred and at least ten (10) days prior to the date of the filing of this praecipe. A copy of the Notice is attached.

Respectfully submitted:

Pateraud & Felix, A.P.C.

Date: _____

Gregg L. Morris, Esquire
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK/TARGET VISA

Plaintiff

v.

TAMMY J MCGLYNN

Defendant(s)

NO. 07-1850-CD

**PLAINTIFF'S AFFIDAVIT OF NON-MILITARY SERVICE AND MAILING OF
NOTICE PURSUANT TO PA.R.C.P. 1037(b)**

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF CLEARFIELD

SS.

Before me, the undersigned authority, a Notary Public in and for said County and State, personally appeared GREGG MORRIS, attorney for and authorized representative of Plaintiff, who being duly sworn according to law, deposes and states that the defendant(s), TAMMY J MCGLYNN, is not in the military service of the United States of America to the best of his knowledge, information and belief and certifies that Notice of Intent to take Default Judgment was mailed in accordance with Pa.R.C.P.237.1, as evidenced by the attached copy.

Respectfully submitted:

Pateranide & Felix, A.P.C.

Date: _____

Gregg L. Morris, Esquire
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675

Sworn to and subscribed before me this

26 day of Feb., 2008

Notary Public

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal

Carolyn J. Stewart, Notary Public

Carnegie Boro, Allegheny County

My Commission Expires Aug. 14, 2011

Member, Pennsylvania Association of Notaries

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK/TARGET VISA

Plaintiff

v.

TAMMY J MCGLYNN

Defendant(s)

)
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) NO. 07-1850-CD
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)
)

IMPORTANT NOTICE

Filed on behalf of:
TARGET NATIONAL BANK/TARGET
VISA

Counsel of Record for This Party:

Gregg L. Morris, Esquire
Pa I.D. #69006

Patenaude & Felix, A.P.C.
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK/TARGET VISA

Plaintiff

v.

TAMMY J MCGLYNN

Defendant(s)

NO. 07-1850-CD

To: Tammy J McGlynn
77 Alexander Ln
Houtzdale Pennsylvania 16651-8327

Date of Notice: January 07, 2008

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS.

YOU SHOULD TAKE THIS NOTICE TO A LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

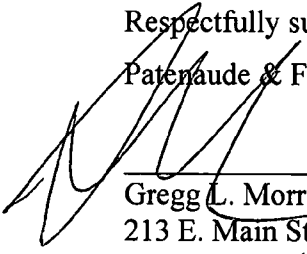
IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

Clearfield County Courthouse
David S. Meholick, Court Administrator 230 East Market Street
Clearfield PA 16830
814-765-2641

Respectfully submitted:

Patenaude & Felix, A.P.C.

Date: _____



Gregg L. Morris, Esquire
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

TARGET NATIONAL BANK/TARGET VISA

Plaintiff

NO. 07-1820-CD

TAMMY J. MCGILLYN

Defendant(s)

NOTICE OF ORDER, DECREE
OR JUDGMENT

Filed on behalf of
TARGET NATIONAL
BANK/TARGET VISA

Court of Record for this Party

Gregg L. Morris, Esquire
P.O. Box 489006

Patton & Felix, A.P.C.
213 E. Main Street
Carnegie, PA 15106
(412) 439-7672

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK/TARGET VISA

Plaintiff

v.

TAMMY J MCGLYNN

Defendant(s)

NO. 07-1850-CD

COPY

NOTICE OF ORDER, DECREE OR JUDGMENT
AGAINST TAMMY J MCGLYNN ONLY

TO: () Plaintiff (x) Defendant () Garnishee () Additional Defendant

You are hereby notified that the following Order, Decree, or Judgment has been entered
against you on March 3, 2008.

- () Decree Nisi in Equity
() Final Decree in Equity
(X) Judgment of () Confession () Verdict () Court Order
(X) Default () Non-suit
() Non-Pros () Arbitration Award

- (X) Judgment in the amount of \$9,385.35, plus costs.
() District Justice Transcript of Judgment in the amount of \$ _____,
plus costs.
() If not satisfied within sixty (60) days, your motor vehicle operator's license will be
suspended by the Department of Transportation.

Prothonotary

By William L. H. [Signature]

Deputy

If you have questions concerning the above, please Contact:

Name of Attorney: GREGG MORRIS, Esquire
213 East Main St
Carnegie PA 15106
(412)-429-7675

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA
STATEMENT OF JUDGMENT

COPY

Target National Bank
Target Visa
Plaintiff(s)

No.: 2007-01850-CD

Real Debt: \$9,385.35

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Tammy J. McGlynn
Defendant(s)

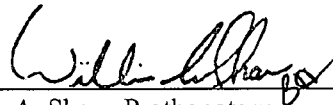
Entry: \$20.00

Instrument: Default Judgment

Date of Entry: March 3, 2008

Expires: March 3, 2013

Certified from the record this 3rd day of March, 2008.



William A. Shaw, Prothonotary

SIGN BELOW FOR SATISFACTION

Received on _____, _____, of defendant full satisfaction of this Judgment,
Debt, Interest and Costs and Prothonotary is authorized to enter Satisfaction on the same.

Plaintiff/Attorney

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK

Plaintiff

v.

TAMMY J MCGLYNN

77 Alexander Ln Houtzdale Pa 16651-8327

Defendant(s)

FIRST COMMONWEALTH BANK

709 Hannah Street Houtzdale Pa 166511238

Garnishee

NO. 07-1850-CD

**PRAECIPE FOR WRIT OF
EXECUTION**

Filed on behalf of:
TARGET NATIONAL BANK

Counsel of Record for This Party:

Gregg L. Morris, Esquire
Pa I.D. #69006

Patenaude & Felix, A.P.C.
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675

FILED *Atty pd*
mtg 5/13/11 20.00
JAN 30 2012
3CC @le writs
to Sheriff
66
William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK

Plaintiff

v.

TAMMY J MCGLYNN

77 Alexander Ln Houtzdale Pa 16651-8327

Defendant(s)

FIRST COMMONWEALTH BANK

709 Hannah Street Houtzdale Pa 166511238

Garnishee

NO. 07-1850-CD

PRAECIPE FOR WRIT OF EXECUTION

To The Prothonotary:

Issue writ of execution in the above matter,

- (1) directed to the Sheriff of Clearfield County;
- (2) against, TAMMY J MCGLYNN Defendant(s);
- (3) against, FIRST COMMONWEALTH BANK, Garnishee;
- (4) and index this writ
- (a) against, Defendant(s) TAMMY J MCGLYNN, Defendant(s); and
- (b) against FIRST COMMONWEALTH BANK, Garnishee;

as a *lis pendens* against real property of the Defendant(s) in the name of the garnishee as follows:

(5) Amount due	\$9,385.35
Interest from March 03, 2008	
At 6.00 % per annum	\$2,192.31
Court Cost	\$0.00
Less: Payment	\$0.00
Total	\$11,577.66 + costs

125.00 Prothonotary costs

Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK

Plaintiff

v.

TAMMY J MCGLYNN

77 Alexander Ln Houtzdale Pa 16651-8327

Defendant(s)

FIRST COMMONWEALTH BANK

709 Hannah Street Houtzdale Pa 166511238

Garnishee

NO. 07-1850-CD

WRIT OF EXECUTION

Filed on behalf of:

TARGET NATIONAL BANK

Counsel of Record for This Party:

Gregg L. Morris, Esquire

Pa I.D. #69006

Patenaude & Felix, A.P.C.

213 E. Main Street

Carnegie, PA 15106

(412) 429-7675

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK

Plaintiff

v.

TAMMY J MCGLYNN

77 Alexander Ln Houtzdale Pa 16651-8327

Defendant(s)

FIRST COMMONWEALTH BANK

709 Hannah Street Houtzdale Pa 166511238

Garnishee

NO. 07-1850-CD

WRIT OF EXECUTION

To the Sheriff of Clearfield County:

To satisfy the judgment, interest and costs against TAMMY J MCGLYNN,
Defendant(s),

(1) You are directed to levy upon the property of the defendant(s) and to sell his interest therein;

(2) You are also directed to attach the property of the defendant(s) not levied upon in the possession of FIRST COMMONWEALTH BANK as Garnishee, and to notify garnishee that

(a) an attachment has issued;

(b) except as provided in paragraph (c), the garnishee is enjoined from paying any debt to or for the account of the defendant and from delivering any property of the defendant or otherwise disposing thereof;

(c) the attachment shall not include [any funds in an account of the defendant with a bank or other financial institution

(i) in which funds are deposited electronically on a recurring basis and are identified as being funds that upon deposit are exempt from execution, levy or attachment under Pennsylvania or federal law, or] (i) the first \$10,000 of each account of the defendant in with a bank or other financial institution containing any funds which are deposited electronically on a recurring basis and are identified as being funds that upon deposit are exempt from execution, levy or attachment under Pennsylvania or federal law.

(ii) each account of the defendant with a bank or other financial institution in which funds on deposit exceed \$10,000 at any time if all funds are deposited electronically on a recurring basis and are identified as being funds that upon deposit are exempt from execution, levy or attachment under Pennsylvania or federal law.

(iii) any funds in an account of the defendant with a bank or other financial institution that total \$300 or less. If multiple accounts are attached, a total of \$300 in all accounts shall not be subject to levy and attachment as determined by the executing officer. The funds shall be set aside pursuant to the defendant's general exemption provided in 42 Pa.C.S. 8123.

(3) If property of the defendant not levied upon and subject to attachment is found in the possession of anyone other than a named garnishee, you are directed to notify such person that he/she has been added as a garnishee and is enjoined as above stated.

Amount due	\$9,385.35
Interest from March 03, 2008	
At 6.00 % per annum	\$2,192.31
Court Cost	\$0.00
Less: Payment	\$0.00
Total Due	\$11,577.66 + costs

Seal
BY

1/30/12

125.00 Prothonotary costs

Prothonotary

William J. ...
301

TARGET NATIONAL BANK

V.

77 Alexander Ln Houtzdale Pa 16651-8327

Defendant(s)

709 Hannah Street Houtzdale Pa 166511238

Garnishee

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK

Plaintiff

v.

TAMMY J MCGLYNN

77 Alexander Ln Houtzdale Pa 16651-8327

Defendant(s)

FIRST COMMONWEALTH BANK

709 Hannah Street Houtzdale Pa 166511238

Garnishee

NO. 07-1850-CD

WRIT OF EXECUTION
NOTICE

This paper is a Writ of Execution. It has been issued because there is a judgment against you. It may cause your property to be held or taken to pay the judgment. You may have legal rights to prevent your property from being taken. A lawyer can advise you more specifically of these rights. If you wish to exercise your rights, you must act promptly.

The law provides that certain property cannot be taken. Such property is said to be exempt. There is a debtor's exemption of \$300. There are other exemptions which may be applicable to you. Attached is a summary of some of the major exemptions. You may have other exemptions or other rights.

If you have an exemption, you should do the following promptly: (1) Fill out the attached claim form and demand for a prompt hearing. (2) Deliver the form or mail it to the Sheriff's Office at the address noted.

You should come to court ready to explain your exemption. If you do not come to court and prove your exemption, you may lose some of your property.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

CLEARFIELD COUNTY COURTHOUSE
DAVID S. MEHOLICK, COURT ADMINISTRATOR 230 EAST MARKET STREET
CLEARFIELD PA 16830
814-765-2641

MAJOR EXEMPTIONS UNDER
PENNSYLVANIA AND
FEDERAL LAW

- A. \$300 statutory exemption
- B. Bibles, school books, sewing machines, uniforms and equipment
- C. Most wages and unemployment compensation
- D. Social Security Benefits
- E. Certain retirement funds and accounts
- F. Certain veteran and armed forces benefits
- G. Certain insurance proceeds
- H. Such other exemptions as may be provided by law

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK

Plaintiff

v.

TAMMY J MCGLYNN

77 Alexander Ln Houtzdale Pa 16651-8327

Defendant(s)

FIRST COMMONWEALTH BANK

709 Hannah Street Houtzdale Pa 166511238

Garnishee

NO. 07-1850-CD

CLAIM FOR EXEMPTION
TO THE SHERIFF:

I, the above named defendant, claim exemption of property from levy or attachment:

(1) From my personal property in my possession which has been levied upon,

(a) I desire that my \$300 statutory exemption be

____(i) set aside in kind (specify the property to be set aside in kind): _____

____(ii) paid in cash following the sale of the property levied upon; or

(b) I claim the following exemption (specify property and basis of exemption): _____

(2) From my property which is in the possession of a third party, I claim the following exemptions:

(a) my \$300 statutory exemption be ____ in cash; ____ in kind (specify the property to be set aside in kind): _____

(b) other (specify the amount and the basis of the exemption): _____

I request a prompt hearing to determine the exemption. Notice of the hearing should be given to me at the following address: _____

(_____) _____

Telephone Number

I verify that the statements made in this Claim for Exemption are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

Date: _____

Defendant

THIS CLAIM TO BE FILED WITH
THE OFFICE OF THE SHERIFF
OF CLEARFIELD COUNTY COURT OF COMMON PLEAS
CLEARFIELD, PA 16830

(814)-76-5-26

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK

Plaintiff

v.

TAMMY J MCGLYNN

77 Alexander Ln Houtzdale Pa 16651-8327

Defendant(s)

FIRST COMMONWEALTH BANK

709 Hannah Street Houtzdale Pa 166511238

Garnishee

NO. 07-1850-CD

**INTERROGATORIES IN
ATTACHMENT EXECUTION**

Filed on behalf of:

TARGET NATIONAL BANK

Counsel of Record for This Party:

Gregg L. Morris, Esquire
Pa I.D. #69006

Patenaude & Felix, A.P.C.
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK

Plaintiff

v.

TAMMY J MCGLYNN

77 Alexander Ln Houtzdale Pa 16651-8327

Defendant(s)

FIRST COMMONWEALTH BANK

709 Hannah Street Houtzdale Pa 166511238

Garnishee

NO. 07-1850-CD

OFFICES OF PATENAUE & FELIX
BY: GREGG MORRIS, ESQUIRE
213 East Main St
Carnegie PA 15106
858-244-7675

You are hereby notified to
plead to the enclosed
Interrogatories within 20
days from the date of
hereof or a default
judgment may be entered
against you.

Gregg Morris, Esquire
Attorney for Plaintiff

INTERROGATORIES IN ATTACHMENT EXECUTION

You are required to answer the following interrogatories about Defendant(s) whose address is 77 ALEXANDER LN, HOUTZDALE PA 16651-8327. You must file with the Court answers to the following interrogatories within twenty (20) days after service upon you. Failure to do so may result in a default judgment being entered against you. A copy of said answers must be served on the undersigned. If your answer to any of the following interrogatories is affirmative, specify the amount, value and/or nature of the subject property.

1. At the time you were served or at any subsequent time, did you owe the defendant(s) any money or were you liable to defendant(s) on any negotiable or other written instrument, or did defendant(s) claim that you owed them any money or were you liable to them for any reason? If yes, please specify as set forth herein.

2. At the time you were served, or at any subsequent time, was there in your possession, custody or control, or in joint possession, custody or control of yourself or others, any property of any nature owned solely or in part by the Defendant(s)? If yes, please list and describe the property.

3. At the time you were served, or at any subsequent time, did you hold legal title to any property of any nature owned solely or in part by the Defendant(s)? If yes please list and describe the property.

4. At the time you were served, or at any subsequent time, did you hold as fiduciary any property in which the Defendant(s) had an interest? If yes, please list and describe the property.

5. At any time before or after you were served, did the Defendant(s) transfer or deliver any property to you, or to any person, or place pursuant to your directions or consent? If yes, what was the consideration therefore?

6. At any time after you were served, did you pay, transfer, or deliver any money or property to the Defendant(s) or to any person or place pursuant to their direction, or otherwise discharge any claim of the Defendant(s) against you.

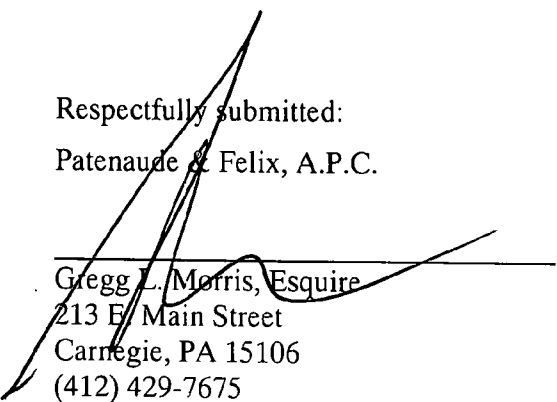
7. If you are a bank or other financial institution, at the time you were served or at any subsequent time did the defendant have funds on deposit in an account in which funds are deposited electronically on a recurring basis and which are identified as being funds that upon deposit are exempt from execution, levy or attachment under Pennsylvania or federal law? If so, identify each account and state the reason for the exemption, the amount being withheld under each exemption and the entity electronically depositing those funds on a recurring basis.

8. If you are a bank or other financial institution, at the time you were served or at any subsequent time did the defendant have funds on deposit in an account in which the funds on deposit, not including any otherwise exempt funds, did not exceed the amount of the general monetary exemption under 42 Pa.C.S. § 8123? If so, identify each account.

Respectfully submitted:

Patenaude & Felix, A.P.C.

Date: January 23, 2012


Gregg L. Morris, Esquire

213 E. Main Street

Carnegie, PA 15106

(412) 429-7675

To Deputy 2/3/12

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 07-1850-CD

TARGET NATIONAL BANK

vs

SERVICE # 1 OF 2

TAMMY J. MCGLYNN

TO: FIRST COMMONWEALTH BANK, Garnishee

WRIT OF EXECUTION, INTERROGATORIES

SERVE BY: 04/28/2012 ^{RUSH} HEARING: PAGE: 109296

DEFENDANT: FIRST COMMONWEALTH BANK, Garnishee

ADDRESS: 709 HANNAH STREET
HOUTZDALE, PA 16651-1238

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: GARNISHEE

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT

OCCUPIED

ATTEMPTS:	Date	Time	Results	Date	Time	Results
	/	/		/	/	

William A. Shaw
Prothonotary/Clerk of Courts

FILED
9 10 11 AM
FEB 08 2012

SHERIFF'S RETURN

NOW, 2-7-12 AT 243 AM ☒ PM SERVED THE WITHIN

WRIT OF EXECUTION, INTERROGATORIES ON FIRST COMMONWEALTH BANK, Garnishee, DEFENDANT

BY HANDING TO Sandra Zatsky, Teller Ser. Sup.

A TRUE AND ATTESTED COPY OF THE ORIGINAL DOCUMENT AND MADE KNOW TO HIM / HER THE CONTENTS THEREOF.

ADDRESS SERVED

() Residence () Employment () Sheriff's Office () Other

NOW _____ AT _____ AM / PM POSTED THE WITHIN

WRIT OF EXECUTION, INTERROGATORIES FOR FIRST COMMONWEALTH BANK, Garnishee

AT (ADDRESS) _____

NOW _____ AT _____ AM / PM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF **NOT FOUND** AS TO FIRST COMMONWEALTH BANK, Garnishee

REASON UNABLE TO LOCATE _____

SWORN TO BEFORE ME THIS

_____ DAY OF _____ 2012

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

Deputy Signature

Print Deputy Name

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

Dkt Pg. 109296

2 of 2

TARGET NATIONAL BANK

NO. 07-1850-CD

-VS-

TAMMY J. MCGLYNN

WRIT OF EXECUTION/
INTERROGATORIES TO
GARNISHEE

TO: FIRST COMMONWEALTH BANK, Garnishee

SHERIFF'S RETURN

NOW FEBRUARY 8, 2012 MAILED THE WITHIN:
PRAECIPE, WRIT, WRIT NOTICE & CLAIM FOR EXEMPTION & INTERROGATORIES
TO: TAMMY J. MCGLYNN, DEFENDANT
AT: 77 ALEXANDER LANE, HOUTZDALE, PA. 16651
IN THE S.A.S.E.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 109296
NO: 07-1850-CD
SERVICES 2

WRIT OF EXECUTION, INTERROGATORIES

PLAINTIFF: TARGET NATIONAL BANK
VS.
DEFENDANT: TAMMY J. MCGLYNN
TO: FIRST COMMONWEALTH BANK, Garnishee

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	PATENAUDE	57850	20.00
SHERIFF HAWKINS	PATENAUDE	57850	44.48

Sworn to Before Me This

_____ Day of _____ 2012

So Answers,



Chester A. Hawkins
Sheriff

FILED

FEB 13 2012
William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

Answer

TARGET NATIONAL BANK

Plaintiff

v.

TAMMY J MCGLYNN

77 Alexander Ln Houtzdale Pa 16651-8327

Defendant(s)

FIRST COMMONWEALTH BANK

709 Hannah Street Houtzdale Pa 166511238

Garnishee

NO. 07-1850-CD

**INTERROGATORIES IN
ATTACHMENT EXECUTION**

Filed on behalf of:
TARGET NATIONAL BANK

Counsel of Record for This Party:

Gregg L. Morris, Esquire
Pa I.D. #69006

Patenaude & Felix, A.P.C.
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK

Plaintiff

v.

TAMMY J MCGLYNN

77 Alexander Ln Houtzdale Pa 16651-8327

Defendant(s)

FIRST COMMONWEALTH BANK

709 Hannah Street Houtzdale Pa 166511238

Garnishee

NO. 07-1850-CD

**OFFICES OF PATENAUE & FELIX
BY: GREGG MORRIS, ESQUIRE
213 East Main St
Carnegie PA 15106
858-244-7675**

**You are hereby notified to
plead to the enclosed
Interrogatories within 20
days from the date of
hereof or a default
judgment may be entered
against you.**

Gregg Morris, Esquire
Attorney for Plaintiff

INTERROGATORIES IN ATTACHMENT EXECUTION

You are required to answer the following interrogatories about Defendant(s) whose address is 77 ALEXANDER LN, HOUTZDALE PA 16651-8327. You must file with the Court answers to the following interrogatories within twenty (20) days after service upon you. Failure to do so may result in a default judgment being entered against you. A copy of said answers must be served on the undersigned. If your answer to any of the following interrogatories is affirmative, specify the amount, value and/or nature of the subject property.

1. At the time you were served or at any subsequent time, did you owe the defendant(s) any money or were you liable to defendant(s) on any negotiable or other written instrument, or did defendant(s) claim that you owed them any money or were you liable to them for any reason? If yes, please specify as set forth herein.

2. At the time you were served, or at any subsequent time, was there in your possession, custody or control, or in joint possession, custody or control of yourself or others, any property of any nature owned solely or in part by the Defendant(s)? If yes, please list and describe the property.

3. At the time you were served, or at any subsequent time, did you hold legal title to any property or any nature owned solely or in part by the Defendant(s)? If yes please list and describe the property.

4. At the time you were served, or at any subsequent time, did you hold as fiduciary any property in which the Defendant(s) had an interest? If yes, please list and describe the property.

5. At any time before or after you were served, did the Defendant(s) transfer or deliver any property to you, or to any person, or place pursuant to your directions or consent? If yes, what was the consideration therefore?

6. At any time after you were served, did you pay, transfer, or deliver any money or property to the Defendant(s) or to any person or place pursuant to their direction, or otherwise discharge any claim of the Defendant(s) against you.

7. If you are a bank or other financial institution, at the time you were served or at any subsequent time did the defendant have funds on deposit in an account in which funds are deposited electronically on a recurring basis and which are identified as being funds that upon deposit are exempt from execution, levy or attachment under Pennsylvania or federal law? If so, identify each account and state the reason for the exemption, the amount being withheld under each exemption and the entity electronically depositing those funds on a recurring basis.

8. If you are a bank or other financial institution, at the time you were served or at any subsequent time did the defendant have funds on deposit in an account in which the funds on deposit, not including any otherwise exempt funds, did not exceed the amount of the general monetary exemption under 42 Pa.C.S. § 8123? If so, identify each account.

Respectfully submitted:

Patenaude & Felix, A.P.C.

Date: January 23, 2012

Gregg L. Morris, Esquire
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675

EXHIBIT "A"

ANSWERS TO INTERROGATORIES

1. No
2. Yes, savings account number 7120084531 into Bailee J. McGlynn or Tammy J. McGlynn or Timothy J. McGlynn with a balance of zero; checking account number 1100056127 into Timothy J. McGlynn or Tammy J. McGlynn, account relation is husband and wife, therefore no funds were held; checking account number 1100060566 into Timothy J. McGlynn or Tammy J. McGlynn, account relation is husband and wife, therefore no funds were held.
3. No
4. No
5. No
6. No
7. No
8. See #2 above

VERIFICATION

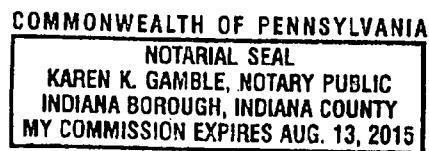
COMMONWEALTH OF PENNSYLVANIA)
)
COUNTY OF INDIANA)

On this 7th day of February 2012 before me, the undersigned officer, a Notary Public in and for said Commonwealth and County, personally appeared LEDA E MCCracken, who being duly sworn according to law, acknowledged that she is Assistant Vice President of First Commonwealth Bank, and that the facts set forth in the foregoing Interrogatories are true and correct to the best of her knowledge and belief.

Leda E McCracken
Leda E. McCracken, Asst. Vice President
First Commonwealth Bank

Sworn and subscribed to before me
This 7th day of February 2012

Karen K. Gamble
Notary Public



CERTIFICATE OF SERVICE

I hereby certify that on February 9, 2012 I have this day caused to be served a true and correct copy of this ANSWERS TO INTERROGATORIES upon the following parties:

VIA CERTIFIED U.S. MAIL

*Bailee J. McGlynn
Tammy J. McGlynn
Timothy J. McGlynn
77 Alexander Ln
Houtzdale, PA 16651-8327*

As Defendant

VIA REGULAR U.S. MAIL

*Gregg L. Morris, Esquire
Paternaude & Felix, A.P.C.
213 E. Main Street
Carnegie, PA 15106*

As Plaintiff

Leda E. McCracken

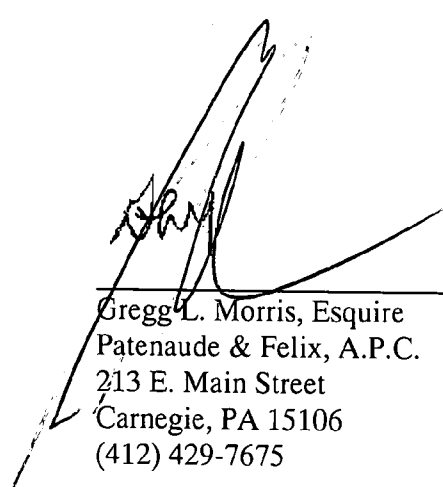
Leda E. McCracken
Assistant Vice President
First Commonwealth Bank

I, GREGG MORRIS, attorney for Plaintiff, TARGET NATIONAL BANK , hereby
certify that a true and correct of the foregoing document was served this date by US First Class

Mail, postage prepaid upon the following:

FIRST COMMONWEALTH BANK
709 HANNAH STREET
HOUTZDALE PA 16651-1238

Date: February 13, 2012



Gregg L. Morris, Esquire
Patenaude & Felix, A.P.C.
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675